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Modern
Slavery
Statement



MODERN SLAVERY STATEMENT 2020

This statement (Statement) is made by Cedar Woods Properties Limited (Cedar Woods) and covers the activities of Cedar Woods and all of its subsidiaries as at 30 June 2020 as set out in its 2020 annual financial report.

Cedar Woods is committed to limiting the risk of modern slavery occurring within its business, infiltrating its supply chain or through any other business relationship.

This Statement is Cedar Woods' first statement on modern slavery and is being made in compliance with the Modern Slavery Act 2018 (Cth) (Modern Slavery Act). This Statement covers the reporting period from 1 July 2019 to 30 June 2020.

The purpose of this Statement is to outline Cedar Woods' approach to ensuring that its business is conducted within a framework that minimises modern slavery risks in its operations and supply chain.

Cedar Woods is committed to limiting the risk of modern slavery occurring within its business.

MODERN SLAVERY

Modern Slavery is defined by the Modern Slavery Act 2018 and includes people trafficking, forced and compulsory labour and certain other forms of human exploitation, such as some forms of child labour.

Tackling modern slavery requires the company's employees and other stakeholders to play a part and remain vigilant to the risk in Cedar Woods' business and business relationships.





STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Cedar Woods is a national developer of residential communities and commercial properties and its operations are wholly conducted within Australia.

The company has supply chains that predominantly include, but are not limited to:

- Consultancy services
- Building and construction services, including civil works
- Financial and insurance services
- Technology (hardware and software)
- Maintenance services
- Marketing, sales agents and conveyancing
- Professional services
- Office accommodation and related services

RISKS OF MODERN SLAVERY PRACTICES

Due to its internal policies and compliance, the risk of any modern slavery practices within the company's own operations is minimal.

The Company has approximately 80 employees, primarily skilled professionals, who are all based in Australian capital cities.

They do not hold roles or positions that are at high risk or vulnerable to slavery or human trafficking. Cedar Woods has systems and processes in place to ensure that all employees are recruited with the full knowledge of the role that they will undertake, that appropriate checks are undertaken to ensure that employees are over the age of 18 and that employees have the appropriate rights to work in Australia and are paid a minimum wage or above for the work that they do.

The property development sector within Australia is not traditionally an industry exposed to risks of forced labour or human trafficking, and most of the company's suppliers are Australian-based, long term suppliers where the risk of modern slavery is low. All of the Company's material suppliers (determined by value of expenditure) are based in Australia.

We identify that the greatest risk within the supply chains lies downstream of our immediate suppliers and as such we endeavour to ensure that our suppliers are made aware of our modern slavery policy and implement such contractual clauses required to reduce or remove risk of modern slavery and ensure that our suppliers undertake to ensure that they, and their suppliers, comply with the Modern Slavery law in Australia.

Cedar Woods employees do not hold roles or positions that are at high risk or vulnerable to slavery or human trafficking.

MODERN SLAVERY GOVERNANCE AND PROCESSES

Cedar Woods has executives and senior managers who are responsible for human resources, risk and legal compliance. Those persons report to the Managing Director who in turn reports to the Audit and Risk Management Committee and the Board.

Cedar Woods has formal policies in place (applicable to Directors, employees and consultants) that promote ethically and legally compliant business conduct, both internally and within the supply chain including:

- Code of Conduct
- Whistleblower Policy
- Anti-Bribery and Corruption Policy
- Environmental Management & Climate Change Policy

The following procedures are implemented pursuant to the company's modern slavery policy:

- The company maps its operations and supply chains to determine which parts of the business and supply chains are most at risk from modern slavery, so efforts can be focused on the areas most at risk;

Cedar Woods has formal policies in place that promote ethically and legally compliant business conduct, both internally and within the supply chain.

- Informed by risk assessments, the company engages with existing and new suppliers in order to inform them of the company's policy and in order to gain an understanding of the measures they have in place to ensure that modern slavery is not occurring in their own businesses
- Our vendor onboarding procedure seeks to identify any particular modern slavery risks associated with material suppliers
- Our contractual documentation incorporates specific requirements with respect to the prohibition of modern slavery and requires our suppliers to maintain similar requirements with their own suppliers

The company regularly conducts assessments of its suppliers under a number of performance criteria, including that of enforcement of anti-slavery practices. The company will discontinue engagement with suppliers that fail to meet performance criteria.



Cedar Woods has requested that suppliers required to report under the Modern Slavery Act provide their own Modern Slavery Statements.



PROCEDURES UNDERTAKEN IN REPORTING PERIOD

In early 2019 Cedar Woods developed a Modern Slavery policy.

In mid-2019, Cedar Woods commenced a review of material suppliers in its supply chain. The materiality was measured by value of expenditure and covered suppliers that collectively represented approximately 80% of the procurement expense of the group.

In June 2019 Cedar Woods undertook a campaign to all suppliers in its database informing them of:

- Cedar Woods' obligations under the Modern Slavery Act
- Cedar Woods Modern Slavery policy
- Required clauses that would be required to be inserted into material procurement contracts commencing in July 2019

Cedar Woods also requested that suppliers required to report under the Modern Slavery Act provide their own Modern Slavery Statements and has engaged with individual material suppliers on an as-needed basis to review feedback and monitor their progress with implementing anti-modern slavery practices in their own organisations.

While Cedar Woods considers the overall approach adopted in FY20 was effective in identifying and addressing potential modern slavery risks in its supply chain, engagement with our suppliers has revealed that each are at a different point on the journey to adopt their own modern slavery practices.

We are committed to ensuring that over the next reporting period we develop more effective means to encourage greater progress by our suppliers in adopting their own modern slavery risk programs.

COMMUNICATION AND EMPLOYEE AWARENESS TRAINING

Senior Management has ensured that relevant employees receive adequate training on the policy and any supporting processes applicable to their role.

BREACHES OF POLICY

The breach of Cedar Woods Modern Slavery policy by an employee, director or officer of the Company may lead to disciplinary action being taken. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal.

Any employee who reports a breach under the policy will be entitled to the protection under the company's whistle-blowing policy.

ONGOING MONITORING AND AUDITING

Cedar Woods is committed to maintaining an ongoing dialogue with its vendors on modern slavery. Cedar Woods has already commenced bi-annual monitoring and spot-check assessments of existing suppliers, as well as undertaking risk assessments of new material suppliers that are on-boarded.

APPROVAL OF MODERN SLAVERY STATEMENT

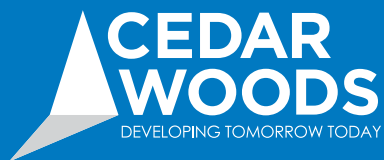
The policy statement is approved by the Board of Directors of Cedar Woods Properties Limited.

Signed,



Nathan Blackburne
Managing Director





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